

REMARKS

The requirement for formal drawings is acknowledged. The Applicant will submit new formal drawings when the application is allowed.

Claims 1-6, 17, 20, 21, 23 and 24 stand rejected as unpatentable over *Razin* (U.S. 6,125,377) in view of newly-cited *Felt* (U.S. 6,092,092). The Applicants respectfully traverse this rejection.

In the First Response filed March 19, 2004, the Applicants pointed out that *Razin* does not identify or store a formatting run comprising the smallest section of text having the same formatting attributes within a document, contrary to the present invention. The Examiner has cited *Felt* as disclosing a system wherein "style information is organized into style runs associated with a contiguous group of characters having the same style". Asserting that *Razin* and *Felt* are both from the same field of endeavor, the Examiner concluded that it would have been obvious to a person of ordinary skill in the art to modify the teaching of *Razin* with the teachings of *Felt*, namely, wherein the style information is organized into style runs associated with a contiguous group of characters having the same style, thereby storing style information in a manner which allows fast access to the style information of a specific character and rapid modification of that information.

However, a close reading of both *Felt* and *Razin* reveals significant differences in their respective teachings, both in concept and in methodology. The applicants submit that these differences are such that one of ordinary skill, knowing only the disclosures of those references but lacking the Applicants' teachings, would have found it non-feasible as well as non-obvious to modify *Razin*, in view of *Felt*, to produce a system for

improving formatting consistency comprising the combination of elements set forth in Claim 1.

Razin discloses a computer system for proofreading a document in electronic form. A central problem addressed by *Razin* is identifying the structure and significant units of text within an unknown user document (column 1, lines 6-8). That problem is complicated, according to *Razin*, by an inability to predesignate any firm conclusive rules as to the use of any particular style at a given location in the document, and further by the possibility of inconsistent structures and file usage within the same document (column 1, lines 9-13). *Razin* addresses those problems with the steps summarized at column 1, lines 26-32, including identifying certain attributes of units of text. Only those units of text meeting a significant number of the criteria required by *Razin's* rules base are deemed candidate Unknown Elements, for additional analysis and interpretation (column 3, lines 31-41).

The fourth step of *Razin's* method requires establishing standard styles for the document undergoing proofreading. This step includes incrementing a counter for each type of known element (column 13, lines 7-11) and, when this incrementation exceeds a threshold number of occurrences, defining it as a significant style. Only those units of text meeting a significant number of the criteria required by the as-determined rules base are candidate unknown elements for additional analysis and interpretation, in the next step of *Razin's* process (column 3, lines 31-41). Accordingly, *Razin* teaches away from formatting runs less than a predetermined minimum number.

Felt, in contrast with *Razin*, describes a process for storing and retrieving style information by storing that information in an array, in parallel with the character

information stored within another data structure. According to *Felt*, each style is associated with a contiguous group of characters having the same style (column 5, lines 39-41). *Felt* teaches allocating more memory to the style information array than would be required to store the style information. This surplus memory forms a so-called gap in the array at a location corresponding to the point at which characters are being modified (abstract, lines 1-7).

Although *Razin* and *Felt* may both be from the same field of endeavor — word processing, broadly stated — the Applicants submit that the respective disclosures of those references are so different in methodology and in outcome that one of ordinary skill, knowing the teachings of *Razin* and *Felt* but not of the present Applicants, would not have sought to modify *Razin* by choosing a formatting run as "the smallest section of text within the document having the same formatting attributes" as required by Claim 1. *Razin* addresses the problem of identifying structure and significant units of text with an unknown user document, lacking the ability to predesignate any firm rules as to style or consistent style usage within that document. That reference then teaches one of ordinary skill the several steps detailed by *Razin*, which include establishing a threshold number of occurrences to define each significant user style and then determining insistences exceeding that threshold number. *Felt*, on the other hand, is concerned with storing style information in a manner which allows fast access and rapid modification of that information to a specific character. The Applicants submit, therefore, that one of ordinary skill would have found *Felt's* teachings incompatible with the methodology taught by *Razin*. Moreover, any attempt to combine those incompatible teachings, in any practical sense, would result in the destruction of the procedures in *Razin*, or perhaps of

both references. Accordingly, the Applicants submit that it would not have been obvious, from *Felt*, to have modified the teachings of *Razin* so as to produce a system as defined in Claims 1 *et seq.*

Claims 7-12 and 19 stand rejected as unpatentable over *Razin* in view of *Newbold* (U.S. 5,576,955). Claims 7-12 depend from Claim 1, and the Applicants traverse the rejection for the reasons set forth on page 9 of the previous response. As pointed out in those reasons and hereinabove, *Razin* teaches away from the requirements of the claimed invention, including a formatting run defined as the smallest section of text within the document having the same formatting attributes. Accordingly, nothing in *Razin* and *Newbold* would have taught the subject matter of Claims 7-12 to one of ordinary skill in the art.

As to Claim 19, that claim depends from Claim 17 and thus includes the step of determining a formatting run that "comprises the smallest section of text within the document having the same formatting attributes". Claim 19 thus would not have been obvious to one of ordinary skill in the art, from *Razin* and *Newbold*.

Claims 13-15 stand rejected as unpatentable over *Razin* in view of *Fein* (U.S. 6,088,711). The Applicants respectfully traverse this rejection. Claim 13 depends from Claim 1, and Claims 14 and 15 each depend from Claim 13. Accordingly, Claims 13-15 define a system including the limitation that a formatting run is the smallest section of text within the document having the same formatting attributes. Neither *Razin* nor *Fein* teach that requirement and, as previously pointed out, *Razin* teaches away from that step. Accordingly, Claims 13-15 are patentable notwithstanding *Razin* and *Fein*.

